

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



September 29, 2009

Reply to Attn of LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Blanket approval for MSFC Employees to attend the 21st Annual
Dr. Wernher von Braun Memorial Dinner

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA employees have been invited to attend the 21st Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club (NSC), scheduled for Wednesday, October 21, 2009, at the U.S. Space & Rocket Center Davidson Center for Space Exploration.

NSC was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of aerospace industry representatives and local elected officials, as well as other community leaders. Besides 160 MSFC employees, Federal officials invited include employees of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Army Forces Strategic Command, and the Missile Defense Agency, and local government officials. The event is valued at \$75.00 per person and approximately 850 individuals have been invited to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

I have determined that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its activities. Given the purpose of the event, the broad attendance anticipated, and the reasonable market value of this event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect the NSC, or a majority of its members, are not covered in this determination and should seek a specific determination from this office pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.


James R. Frees
Acting Chief Counsel